



## U.S. Department of Justice

United States Attorney  
Southern District of New YorkUSDC SDNY  
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MEMORANDUM ENDORSED

86 Chambers Street  
New York, New York 10007

December 16, 2024

VIA ECFHon. Gregory H. Woods  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007**Re: Kathryn O. Greenberg Immigration Justice Clinic v. ICE, et ano.,  
No. 24 Civ. 8542 (GHW)**

Dear Judge Woods:

This Office represents the government in the above-referenced action, in which plaintiff asserts a FOIA claim against Immigration and Customs Enforcement (“ICE”), Department of Homeland Security. I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from December 23, 2024, to February 21, 2025), and an adjournment of the initial pretrial conference presently scheduled for February 18, 2025, to March 4, 2025, or a date thereafter that is convenient for the Court (with a corresponding extension of time for the pre-conference submissions).

The government requests this extension and adjournment because ICE is in the process of reviewing records that are potentially responsive to the FOIA request, and the parties need additional time to consider next steps, which could resolve this matter without the Court’s intervention. This is the government’s first request for an extension of the deadline to respond to the complaint and an adjournment of the initial pretrial conference. Plaintiff consents to the requested relief.

I thank the Court for its consideration of this letter.

Application granted. The request by Defendants Immigration and Customs Enforcement, and Department of Homeland Security (collectively, the “Government”) for an extension of time to answer or otherwise respond to the complaint and request to adjourn the initial pretrial conference, Dkt. No. 19, is granted. The deadline for the Government to answer or otherwise respond to the complaint is extended to February 21, 2025. The initial pretrial conference scheduled for February 18, 2025 is adjourned to March 6, 2025 at 4:00 p.m. The joint status letter and proposed case management plan described in the Court’s November 18, 2024 order are due no later than February 27, 2025. The Clerk of Court is directed to terminate the motions pending at Dkt. Nos. 11, 19.

SO ORDERED.

Dated: December 17, 2024  
New York, New York  
GREGORY H. WOODS  
United States District Judge

Respectfully submitted,

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cc: Counsel of record (via ECF)